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9 TONKON TORP LLP

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10 Portland, OR 97204-2099

11 Attorneys for Debtors

12
13 UNITED STATES BANKRUPTCY COURT

14 DISTRICT OF OREGON

15 In re

16 Wall to Wall Tile & Stone, LLC (TIN 9732),
17 Wall to Wall Tile & Stone-Oregon LLC
18 (TIN 1863), and Wall to Wall Tile & Stone-
Idaho LLC (TIN 9431),

19 Debtors.

Case No. 19-32600-dwh11

LEAD CASE

(Jointly Administered with Case
Nos. 19-32599-dwh11 and
19-32603-dwh11)

**DEBTORS' MOTION TO EXTEND
TIME TO FILE INITIAL MONTHLY
OPERATING REPORTS**

21 Wall to Wall Tile & Stone, LLC, Wall to Wall Tile & Stone-Oregon LLC, and
22 Wall to Wall Tile & Stone-Idaho LLC, debtors and debtors-in-possession ("Debtors"), hereby
23 move this Court for entry of an order (i) consolidating the reporting periods for the initial
24 monthly operating reports required by FRBP 2015 and (ii) setting September 23, 2019, as the
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1 deadline by which Debtors must file their initial Rule 2015 monthly operating reports ("Monthly
2 Operating Reports"). In support of this motion, Debtors state as follows:

3 1. On July 16, 2019 (the "Petition Date"), Debtors filed voluntary petitions
4 for relief under Chapter 11 of Title 11 of the United States Code.

5 2. On July 18, 2019, the Court entered an Order Directing Joint
6 Administration Pursuant to FRBP 1015(b) of each of the Debtors' cases [Case No. 19-32600-
7 dwh11 ECF No. 24; Case No. 19-32599-dwh11 ECF No. 29; Case No. 19-32603-dwh11 ECF
8 No. 23].

9 3. Debtors have continued in possession of their property and are continuing
10 to operate and manage their businesses as debtors-in-possession pursuant to Sections 1107(a) and
11 1108 of Title 11 of the United States Code.

12 4. No request has been made for the appointment of a trustee or examiner.
13 An official committee of unsecured creditors was appointed in Debtors' cases on July 26, 2019.

14 5. Without the requested consolidation and extension, Debtors' initial
15 Monthly Operating Reports would be due on August 21, 2019, and would only cover the partial
16 month from the Petition Date through July 31, 2019. With the requested consolidation and
17 extension, Debtors' initial Monthly Operating Reports will be due on September 23, 2019, and
18 will cover the period from the Petition Date through August 31, 2019.

19 6. Debtors have conferred with the Office of the United States Trustee
20 ("UST") and the UST does not oppose this motion.

21 7. A copy of the proposed Order Granting Debtors' Motion to Extend Time
22 to File Initial Monthly Operating Reports is attached hereto as **Exhibit 1**.

1 WHEREFORE, Debtors respectfully request that they be granted an extension of
2 time through September 23, 2019 within which to file their initial Monthly Operating Reports,
3 and that their initial Monthly Operating Reports cover the time period from the Petition Date
4 through August 31, 2019.

5 DATED this 7th day of August, 2019.

6 TONKON TORP LLP
7

8 By /s/ Ava L. Schoen

9 Albert N. Kennedy, OSB NO. 821429

10 Timothy J. Conway, OSB No. 851752

11 Michael W. Fletcher, OSB No. 010448

12 Ava L. Schoen, OSB No. 044072

13 Attorneys for Debtors
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EXHIBIT 1

PROPOSED FORM OF ORDER

UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re

Wall to Wall Tile & Stone, LLC (TIN 9732),
Wall to Wall Tile & Stone-Oregon LLC
(TIN 1863), and Wall to Wall Tile & Stone-
Idaho LLC (TIN 9431),

Debtors.

Case No. 19-32600-dwh11
LEAD CASE

(Jointly Administered with Case
Nos. 19-32599-dwh11 and
19-32603-dwh11)

**ORDER GRANTING DEBTORS'
MOTION TO EXTEND TIME TO
FILE INITIAL MONTHLY
OPERATING REPORTS**

THIS MATTER having come before the Court upon Debtors' Motion to Extend Time to File Initial Monthly Operating Reports (the "Motion") [ECF No. ____], and the Court being duly advised in the premises and finding good cause; now, therefore;

IT IS HEREBY ORDERED that Debtors shall have an extension of time until September 23, 2019, to file their initial Rule 2015 monthly operating reports, and said initial reports shall cover the time period from July 16, 2019 through August 31, 2019.

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I certify that I have complied with the requirements of LBR 9021-1(a).

Presented by:

TONKON TORP LLP

By _____
Albert N. Kennedy, OSB NO. 821429
Timothy J. Conway, OSB No. 851752
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cc: List of Interested Parties

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In addition, I served the foregoing on the parties indicated as "Non-ECF" on the attached List of Interested Parties by mailing copies thereof in sealed, first-class postage prepaid envelopes, addressed to the parties' last-known address and depositing in the U.S. mail at Portland, Oregon on the date set forth below.

TONKON TORP LLP

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Timothy J. Conway, OSB No. 851752
Michael W. Fletcher, OSB No. 010448
Ava L. Schoen, OSB No. 044072
Attorneys for Debtors

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CONSOLIDATED LIST OF INTERESTED PARTIES

***In re Wall to Wall Tile & Stone, LLC, Wall to Wall Tile & Stone-Oregon LLC,
and Wall to Wall Tile & Stone-Idaho LLC***
U.S. Bankruptcy Court Case No. 19-32600-dwh11 LEAD CASE
(Jointly Administered with Case Nos. 19-32599-dwh11 and 19-32603-dwh11)

ECF PARTICIPANTS

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- US TRUSTEE, PORTLAND USTPRegion18.PL.ECF@usdoj.gov

NON-ECF PARTICIPANTS

SECURED CREDITORS

Baffco Enterprises, LLC
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Brush Prairie, WA 98606

Enterprise FM Trust
20400 SW Teton Ave.
Tualatin, OR 97062

PROPERTY TAX ENTITIES

Clark County Treasurer
POB 9808
Vancouver, WA 98666-8808

King County Assessments Dept.
500 4th Ave. S. #708
Seattle, WA 98104

Ada County Assessor
190 E. Front St. #107
Boise, ID 83702

Deschutes County Tax Collector
POB 7559
Bend, OR 97701

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